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FILED
SUPERIOR COURT-STOCKTON

APR 20 2022

BRANDON E. RILEY, CLERK
BY 

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN JOAQUIN

Stockton Branch

STK-CR-FE-2022-

4034

The People of the State of California,
Plaintiff,

v.

ANTHONY GRAY

Defendant(s).

No. SP22-12682

SPD CASE

DA Case: CR-2022-4268975

COMPLAINT

SPE

I, the undersigned, say, on information and belief, that in the
County of SAN JOAQUIN, State of California:

COUNT 1: MURDER PC.187(A)

On or about April 18, 2022, in the County of San Joaquin,
California, ANTHONY GRAY, did commit the crime of MURDER, in
violation of Section 187(a) of the Penal Code, a FELONY, who at the
time and place last aforesaid, did willfully and unlawfully and

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1 intentionally and with malice aforethought murder JANE DOE, DOB:
2 02/22/2007, a human being. It is further alleged that the above
3 offense is a serious felony within the meaning of Penal Code Section
4 1192.7(c)(1).

5
6
7 RULE OF COURT 4.421(A)(1) AND PENAL CODE 1170(B)

8 ROC.4.421(a)(1)/1170(b)

9 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
10 committed the above offense with great violence, great bodily harm,
11 threat of great bodily harm, and/or other acts disclosing a high
12 degree of cruelty, viciousness, or callousness, as set forth Rule of
13 Court 4.421(a)(1) and Penal Code section 1170(b).

14
15
16 RULE OF COURT 4.421(A)(2) AND PENAL CODE SECTION 1170(B)

17 ROC.4.421(a)(2)/1170(b)

18 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
19 committed the above offense while armed with and/or used a weapon,
20 as set forth in Rule of Court 4.421(a)(2) and Penal Code section
21 1170(b).

22
23
24 RULE OF COURT 4.421(A)(3) AND PENAL CODE 1170(B)

25 ROC.4.421(a)(3)/1170(b)

26 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
27 committed the above offense upon a victim that was particularly
28

1 vulnerable, as set forth in Rule of Court 4.421(a)(3) and Penal Code
2 section 1170(b).

3
4 **RULE OF COURT 4.421(A) (8) AND PENAL CODE 1170(B)**

5 **ROC.4.421(a) (8)/1170(b)**

6
7 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
8 committed the above offense in a way that indicates planning,
9 sophistication, and/or professionalism, as set forth in Rule of
10 Court 4.421(a)(8) and Penal Code section 1170(b).

11
12 **RULE OF COURT 4.421(B) (1) AND PENAL CODE 1170(B)**

13 **ROC.4.421(b) (1)/1170(b)**

14
15 NOTICE: It is further alleged that said defendant, ANTHONY GRAY, in
16 the commission of the above offense has engaged in violent conduct
17 that indicates a serious danger to society, as set forth in Rule of
18 Court 4.421(b)(1) and Penal Code section 1170(b).

19
20 **RULE OF COURT 4.421(B) (2) AND PENAL CODE 1170(B)**

21 **ROC.4.421(b) (2)/1170(b)**

22
23 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
24 sustained prior convictions as an adult and/or sustained petitions
25 in juvenile delinquency proceedings are numerous and/or of
26 increasing seriousness, as set forth in Rule of Court 4.421(b)(2)
27 and Penal Code section 1170(b).

1 RULE OF COURT 4.421(B) (3) AND PENAL CODE 1170 (B)

2 ROC.4.421(b) (3) /1170 (b)

3 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
4 served a prior term in prison or county jail under Penal Code
5 Section 1170(h), as set forth in Rule of Court 4.421(b) (3) and Penal
6 Code section 1170(b).
7

8
9 RULE OF COURT 4.421(B) (5) AND PENAL CODE 1170 (B)

10 ROC.4.421(b) (5) /1170 (b)

11 NOTICE: It is further alleged that said defendant, ANTHONY GRAY, had
12 a prior performance on probation, mandatory supervision, post-
13 release community supervision, or parole which was unsatisfactory,
14 as set forth in Rule of Court 4.421(b) (5) and Penal Code section
15 1170(b).
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17
18 SPECIAL CIRCUMSTANCE: MURDER BY TORTURE PC.190.2 (A) (18)

19 It is further alleged that the murder of JANE DOE, DOB: 02/22/2007
20 was COMMITTED by defendant(s), ANTHONY GRAY, and that the murder was
21 intentional and involved the infliction of torture, within the
22 meaning of Penal Code Section 190.2(a) (18).
23

24 PERSONAL USE OF NON-FIREARM WEAPON PC.12022 (B) (1)

25 It is further alleged that in the commission or attempted commission
26 of the above offense, the defendant, ANTHONY GRAY, did personally
27 use a weapon, to-wit: KNIFE, within the meaning of Penal Code
28

1 Section 12022(b)(1). NOTICE: It is further alleged that the above
2 offense is a serious felony within the meaning of Penal Code
3 Sections 1192.7(c) and 1192.8.
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5 For a further and separate cause of complaint, being a different
6 offense from but connected in its commission with the charge(s)
7 above, complainant further complains and says:
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10 **COUNT 2: CORPORAL INJURY TO CHILD PC.273D(A)**

11 On or about April 18, 2022, in the County of San Joaquin,
12 California, ANTHONY GRAY, did commit the crime of CORPORAL INJURY TO
13 CHILD, in violation of Section 273d(a) of the Penal Code, a FELONY,
14 who at the time and place last aforesaid did willfully and
15 unlawfully inflict cruel and inhuman corporal punishment and injury,
16 resulting in a traumatic condition upon a child, to-wit: JANE DOE,
17 DOB: 02/22/2007.
18
19

20 **RULE OF COURT 4.421(A)(1) AND PENAL CODE 1170(B)**

21 **ROC.4.421(a)(1)/1170(b)**

22 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
23 committed the above offense with great violence, great bodily harm,
24 threat of great bodily harm, and/or other acts disclosing a high
25 degree of cruelty, viciousness, or callousness, as set forth Rule of
26 Court 4.421(a)(1) and Penal Code section 1170(b).
27
28

1 RULE OF COURT 4.421(A) (2) AND PENAL CODE SECTION 1170(B)

2 ROC.4.421(a) (2) /1170(b)

3 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
4 committed the above offense while armed with and/or used a weapon,
5 as set forth in Rule of Court 4.421(a) (2) and Penal Code section
6 1170(b) .
7

8
9 RULE OF COURT 4.421(A) (3) AND PENAL CODE 1170(B)

10 ROC.4.421(a) (3) /1170(b)

11 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
12 committed the above offense upon a victim that was particularly
13 vulnerable, as set forth in Rule of Court 4.421(a) (3) and Penal Code
14 section 1170(b) .
15

16
17 RULE OF COURT 4.421(A) (8) AND PENAL CODE 1170(B)

18 ROC.4.421(a) (8) /1170(b)

19 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
20 committed the above offense in a way that indicates planning,
21 sophistication, and/or professionalism, as set forth in Rule of
22 Court 4.421(a) (8) and Penal Code section 1170(b) .
23

24
25 RULE OF COURT 4.421(B) (1) AND PENAL CODE 1170(B)

26 ROC.4.421(b) (1) /1170(b)

27 NOTICE: It is further alleged that said defendant, ANTHONY GRAY, in
28 the commission of the above offense has engaged in violent conduct

1 that indicates a serious danger to society, as set forth in Rule of
2 Court 4.421(b) (1) and Penal Code section 1170(b).

3
4 **RULE OF COURT 4.421(B) (2) AND PENAL CODE 1170(B)**

5 **ROC.4.421(b) (2)/1170(b)**

6
7 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
8 sustained prior convictions as an adult and/or sustained petitions
9 in juvenile delinquency proceedings are numerous and/or of
10 increasing seriousness, as set forth in Rule of Court 4.421(b) (2)
11 and Penal Code section 1170(b).

12
13 **RULE OF COURT 4.421(B) (3) AND PENAL CODE 1170(B)**

14 **ROC.4.421(b) (3)/1170(b)**

15
16 NOTICE: It is further alleged that said defendant, ANTHONY GRAY,
17 served a prior term in prison or county jail under Penal Code
18 Section 1170(h), as set forth in Rule of Court 4.421(b) (3) and Penal
19 Code section 1170(b).

20
21 **RULE OF COURT 4.421(B) (5) AND PENAL CODE 1170(B)**

22 **ROC.4.421(b) (5)/1170(b)**

23
24 NOTICE: It is further alleged that said defendant, ANTHONY GRAY, had
25 a prior performance on probation, mandatory supervision, post-
26 release community supervision, or parole which was unsatisfactory,
27 as set forth in Rule of Court 4.421(b) (5) and Penal Code section
28 1170(b).

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2 **INFLICTION OF GREAT BODILY INJURY PC.12022.7(A)**

3 It is further alleged that in the commission of the above offense
4 the said defendant(s), ANTHONY GRAY, personally inflicted great
5 bodily injury upon JANE DOE, DOB: 02/22/2007, not an accomplice to
6 the above offense, within the meaning of Penal Code Section 12022.7
7 and also causing the above offense to be a serious felony within the
8 meaning of Penal Code Section 1192.7(c)(8).
9

10
11 **PERSONAL USE OF NON-FIREARM WEAPON PC.12022(B)(1)**

12 It is further alleged that in the commission or attempted commission
13 of the above offense, the defendant, ANTHONY GRAY, did personally
14 use a weapon, to-wit: KNIFE, within the meaning of Penal Code
15 Section 12022(b)(1). NOTICE: It is further alleged that the above
16 offense is a serious felony within the meaning of Penal Code
17 Sections 1192.7(c) and 1192.8.
18

19
20 For a further and separate cause of complaint, being a different
21 offense from but connected in its commission with the charge(s)
22 above, complainant further complains and says:
23

24 **COUNT 3: BRING/POSSESS WEAPON ON SCHOOL GROUNDS PC.626.10(a)(1)**

25 On or about April 18, 2022, in the County of San Joaquin,
26 California, ANTHONY GRAY, did commit the crime of BRINGING OR
27 POSSESSING WEAPONS IN SCHOOL GROUNDS, in violation of Section
28

1 626.10(a)(1) of the Penal Code, a MISDEMEANOR, who at the time and
2 place last aforesaid, did willfully and unlawfully have in his/her
3 possession a weapon, to-wit: KNIFE on the grounds of, or within, any
4 public school providing instructions in kindergarten or any of
5 grades 1 through 12; STAGG HIGH SCHOOL.
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7
8 If the above-named defendant(s) is/are presently on probation in San
9 Joaquin County, any evidence presented at a preliminary hearing in
10 the instant case will be used not only as a basis for a holding
11 order in this case but also as evidence of a violation of probation
12 and, at any formal hearing on that violation of probation, the
13 People will move the transcript of the preliminary hearing into
14 evidence as a basis for the violation.
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16
17 Pursuant to Penal Code Section 1054.5(b), the People hereby
18 informally request that the defendant and his/her attorney disclose
19 to the People all information and materials described in Penal Code
20 Section 1054.3.

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1 I declare under penalty of perjury that the foregoing is true and
2 correct except for those things stated on information and belief and
3 those I believe to be true.
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5 Executed on 4/19/2022, at Stockton, California.
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9 Danielle R. Perano
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